

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**STATE DEFENDANTS' MOTION FOR LEAVE TO
FILE EXHIBIT A TO JOINT DISCOVERY STATEMENT UNDER SEAL**

State Defendants seek leave to file Curling Plaintiffs' Exhibit A to the parties' Joint Discovery Dispute Statement [Doc. 1130] under seal. The confidential nature of Exhibit A is the very issue encapsulated in the parties' discovery dispute statement. State Defendants avoid additional argument herein so as to not be accused of asserting arguments related to the dispute in violation of this Court's standing order. State Defendants, however, point the Court to Plaintiffs' motion to seal a prior declaration of Dr. Halderman. [Doc. 1110].

State Defendants attach a proposed order sealing that exhibit with this motion.

Respectfully submitted this 12th day of July 2021.

Vincent R. Russo
Georgia Bar No. 242628
vrusso@robbinsfirm.com
Josh Belinfante
Georgia Bar No. 047399
jbelinfante@robbinsfirm.com
Carey A. Miller
Georgia Bar No. 976240
cmiller@robbinsfirm.com
Alexander Denton
Georgia Bar No. 660632
adenton@robbinsfirm.com
Robbins Ross Alloy Belinfante Littlefield LLC
500 14th Street, N.W.
Atlanta, Georgia 30318
Telephone: (678) 701-9381
Facsimile: (404) 856-3255

/s/ Bryan P. Tyson
Bryan P. Tyson
Georgia Bar No. 515411
btyson@taylorenglish.com
Jonathan D. Crumly
Georgia Bar No. 199466
jcrumly@taylorenglish.com
James A. Balli
Georgia Bar No. 035828
jballi@taylorenglish.com
Diane F. LaRoss
Georgia Bar No. 430830
dlaross@taylorenglish.com
Bryan F. Jacoutot
Georgia Bar No. 668272
bjacoutot@taylorenglish.com
Loree Anne Paradise
Georgia Bar No. 382202
lparadise@taylorenglish.com

TAYLOR ENGLISH DUMA LLP
1600 Parkwood Circle, Suite 200
Atlanta, GA 30339
Telephone: 678-336-7249

Counsel for State Defendants

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing **STATE DEFENDANTS' MOTION FOR LEAVE TO FILE EXHIBIT A TO JOINT DISCOVERY STATEMENT** was prepared double-spaced in 13-point Century Schoolbook pursuant to Local Rule 5.1(C).

/s/ Bryan P. Tyson
Carey A. Miller
Georgia Bar No. 515411